

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

KEITH R. REINHARD and
STACY REINHARD,

Plaintiffs,

AMERISURE INSURANCE COMPANY
and DEAN HEALTH PLAN,

Involuntary Plaintiffs,

No. 2:19-cv-01732-LA

vs.

Judge Lynn Adelman

JPW INDUSTRIES INC.; V-BELT
GLOBAL SUPPLY, LLC; USA
BEARINGS AND BELTS; QUALITY
BEARINGS BELTS AND CHAIN; ABC
INSURANCE CORPORATION; DEF
CORPORATION; and GHI INSURANCE
CORPORATION;

Defendants.

RULE 26(f) REPORT

The parties submit this report in advance of the telephonic scheduling conference on March 11, 2020, at 11:45 a.m., pursuant to Fed. R. Civ. P. 26(f), Fed. R. Civ. P. 16(b), and Civil L. R. 16(a) (E.D. Wis.).

1. **Attorneys of record.** The parties are represented by the following attorneys who have participated in the 26(f) conference and will appear at the telephonic scheduling conference:

Attorney for Keith and Stacy Reinhard
Ronald G. Tays
Tays Law Offices
812 E State St
Milwaukee, WI 53202
414-223-4555

rgt@tayslaw.net

Attorneys for JPW Industries Inc.

Joshua D. Lee
Brian O. Watson
Raymond D. Rushing
Riley Safer Holmes & Cancila LLP
70 W Madison St, Ste 2900
Chicago, IL 60602
312-471-8700
jlee@rshc-law.com
rrushing@rshc-law.com
bwatson@rshc-law.com

Attorney for USA Bearings & Belts

Michael A. Testolin
The Law Offices of Joseph A. Marciniak
2 N LaSalle, Ste 2510
Chicago, IL 60602
312-384-7618
michael.testolin@thehartford.com

Attorney for Quality Bearings Belts and Chain

Paul J. Pytlik
Ratzel Pytlik & Pezze LLC
3330 N Springdale Rd
Brookfield, WI 53045-3594
262-781-1911
ppytlik@ratzel-law.com

2. The nature of the case. The Reinhards filed this case on April 8, 2019, in the Circuit Court for Milwaukee County, Wisconsin, alleging strict liability and negligence claims as a result of Mr. Reinhard's injuries during a workplace accident while operating a powered table saw.

3. Any contemplated motions. Defendants anticipate filing dispositive motions.

4. **The parties' discovery plan.** The parties propose the following discovery plan:

1. If the parties have not already done so, they shall comply with Fed. R. Civ. P. 26(a)(1) concerning initial disclosures.

2. Any amendments to the pleadings shall require either consent of the parties or leave of court consistent with Fed. R. Civ. P. 15.

3. Plaintiffs shall disclose all expert witnesses consistent with Fed. R. Civ. P. 26(a)(2) on or before **July 13, 2020**.

4. Plaintiffs shall offer all expert witnesses for deposition consistent with Fed. R. Civ. P. 26(b)(4) on or before **September 11, 2020**.

5. Defendants shall disclose all expert witnesses consistent with Fed. R. Civ. P. 26(a)(2) on or before **November 11, 2020**.

6. Defendants shall offer all expert witnesses for deposition consistent with Fed. R. Civ. P. 26(b)(4) on or before **January 11, 2021**.

7. All requests for discovery shall be served by a date sufficiently early so that all discovery shall be completed on or before **March 11, 2021**.

8. Any dispositive motions shall be filed on or before **April 12, 2021**.

9. This schedule shall not be modified except upon a showing of good cause and by leave of the court.

5. **Whether the parties anticipate the disclosure or discovery of electronically stored information.** The parties do not anticipate any issues with the disclosure or discovery of electronically stored information.

6. **Whether the parties have reached an agreement for asserting post-production claims of privilege or of protection as trial-preparation material, and whether the parties request the judge to enter an order including the agreement.** The parties agree that post-production claims of privilege or of protection as trial-preparation material shall be asserted consistent with Fed. R. Civ. P. 26(b)(5).

7. **Whether settlement discussions have occurred.** The parties have not engaged in settlement discussions. The parties believe that settlement discussions will be more meaningful after some discovery has been conducted.

8. **The basis for the Court's subject matter jurisdiction.** The Court's subject matter jurisdiction is based on diversity of citizenship and removal under 28 U.S.C. §§ 1332, 1441, and 1446.

9. **Whether the case is included in one of the categories of proceedings exempted from initial disclosures and discovery conference pursuant to Fed. R. Civ. P. 26(a)(1)(B) and 26(f).** This case is not exempt from initial disclosures and discovery conference.

10. **Such other matters as may affect further scheduling of the case for final disposition.** The parties anticipate a stipulated protective order to govern the treatment of any confidential information or protected health information disclosed during the course of the litigation.

Dated: February 21, 2020

Respectfully submitted,

/s/ Ronald Tays

Ronald G. Tays
Tays Law Offices
812 E State St
Milwaukee, WI 53202
414-223-4555
rgt@tayslaw.net
Attorney for Keith and Stacy Reinhard

/s/ Joshua Lee

Joshua D. Lee
Raymond Rushing
Brian O. Watson
Riley Safer Holmes & Cancila LLP
70 West Madison, Suite 2900
Chicago, Illinois 60602
Telephone: (312) 471-8700
Facsimile: (312) 471-8701
jlee@rshc-law.com
rrushing@rshc-law.com
bwatson@rshc-law.com
Attorneys for JPW Industries Inc.

/s/ Michael Testolin

Michael A. Testolin
The Law Offices of Joseph A. Marciniak
2 N LaSalle, Ste 2510
Chicago, IL 60602
312-384-7618
michael.testolin@thehartford.com
Attorney for USA Bearings & Belts

/s/ Paul Pytlik

Paul J. Pytlik
Ratzel Pytlik & Pezze LLC
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ppytlik@ratzel-law.com
Attorney for Quality Bearings Belts and Chain

CERTIFICATE OF SERVICE

The undersigned attorney certifies on February 21, 2020, these papers were electronically filed using the CM/ECF system, which will send notice of this filing to all counsel of record.

/s/ Raymond Rushing